

EXHIBIT 68

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ROCHELLE GLASGOW, et al.,) CASE NO. 5:21-cv-02001DAR
)
Plaintiffs,) JUDGE DAVID A. RUIZ
)
v.) **DECLARATION OF PLAINTIFF WILLIAM**
DANIEL J. BEERS, et al.,) **ROOKER IN SUPPORT OF PLAINTIFFS'**
) **MOTION FOR CLASS CERTIFICATION**
Defendants.)
)

I, William Rooker, declare as follows:

1. I am a Plaintiff in this case and am willing to serve as a Class Representative in this case. The statements herein are based on my personal knowledge and experiences with Liberty HealthShare. I submit this declaration in support of the Plaintiffs' Motion for Class Certification in the above-captioned matter.
2. I signed up for Liberty HealthShare primarily because I was seeking an alternative for my healthcare coverage after having prior coverage through CareFirst and, at times, through employer insurance. When I signed up, I wanted to avoid a gap in health coverage while transitioning from my CareFirst plan to Liberty.
3. I became aware of Liberty HealthShare through my friend Bonnie Martin, who referred me to the organization when I was asking friends who were also small business owners what they were doing for healthcare. Bonnie Martin was using Liberty at the time, and after learning about her experience, I decided to look into Liberty, and eventually joined.
4. I was interested in a health plan that would provide coverage in case of significant medical needs, not just for routine expenses. I consider myself a healthy person and wanted basic

coverage, primarily for more substantial or catastrophic needs, rather than comprehensive coverage that included every doctor visit.

5. I considered Liberty a good match for my needs because it appeared to be a community where people shared healthcare costs and helped one another while maintaining a healthy lifestyle. I considered Liberty to be a sort of health plan or insurance alternative or an option for that type of coverage, and I knew Liberty was promoted as such an alternative. Also, at the time I signed up, it was cheaper than the insurance I had previously held.
6. When I signed up for Liberty HealthShare, I expected to receive peace of mind or assurance that if I needed medical help, medical treatment, that I would have a pool of funds from the group that I could potentially pull from.
7. I decided to become a Plaintiff and proposed Class Representative in this case for multiple reasons, including Liberty HealthShare and its management's inability or unwillingness to pay medical expenses and improper and inappropriate usage of the funds it collected from Liberty HealthShare members, which diminished the coverage available to cover the past, current, and future medical expenses of Liberty HealthShare members.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of July, 2025, in Annapolis, Maryland.

/s/William Rooker
William Rooker